

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

WILLIAM FILLYAW
(D.O.B. xx/xx/1977)Case No. **22-M-586 (SCD)***Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 2, 2022 - October 3, 2022 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 844(i)

Arson of a Vehicle

18 U.S.C. 844(h)

Use of Arson in Furtherance of Another Felony

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

JACOB DETTMER


Digitally signed by JACOB

DETTMER

Date: 2022.10.26 10:23:31 -05'00'

Complainant's signature

Jacob A. Dettmering, Special Agent, FBI

*Printed name and title*Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1Date: 10-26-22City and state: Milwaukee, Wisconsin*Judge's signature*

Hon. Stephen C. Dries, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jacob A. Dettmering, being duly sworn, hereby dispose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since January 7, 2018. I was assigned to the FBI Capitol Area Gang Task Force (CAGTF) in Baton Rouge, Louisiana from June 15, 2018, to April 1, 2020. Since April 1, 2020, I have been assigned as the Task Force Coordinator for the Milwaukee Area Safe Streets Task Force (MASSTF). Since 2018, I have investigated violations of Federal law, directed drug and street gang investigations, obtained and executed search and arrest warrants related to the distribution of illegal narcotics, and debriefed confidential informants and cooperating defendants.

2. This affidavit is submitted for the limited purpose of establishing probable cause to believe that on or about October 3, 2022, in the State and Eastern District of Wisconsin, JAMONTE DAVIS (DOB: XX/XX/1997) and WILLIAM FILLYAW (DOB: XX/XX/1977) committed violations of 18 U.S.C. § 844(i) (Arson of a vehicle) and 844(h) (Use of arson in furtherance of another felony), for the issuance of a criminal complaint.

PROBABLE CAUSE

3. On or about October 3, 2022, at 12:06 a.m., the Waukegan Police Department (Illinois) responded to reports of shots fired at 1334 Chestnut Street, Waukegan, Illinois. Upon arrival, Officers found an adult male in the front driver's seat of a Nissan Altima bearing IL registration CF21896, which was parked in the driveway. The adult male was identified as S.B. (DOB: XX/XX/1980.) S.B. had been shot several times and at approximately 12:26 a.m., S.B. was pronounced deceased by Waukegan Fire Department Paramedics.

4. Video surveillance in the area shows the suspect vehicle, described as a gray Dodge Charger, arrive at the address. At least two subjects exit the vehicle and discharge numerous

rounds of ammunition at the victim's vehicle. Video surveillance footage shows a cell phone fall out of the pocket of one of the subjects and land on the driveway as he/she runs to close range to shoot the victim through the driver's side door. While processing the scene, Investigators found two cell phones laying in the driveway near the vehicle.

5. The vehicle then flees the scene at a high rate of speed.

6. At approximately 12:45 a.m. on October 3, 2022, a gray colored Dodge Charger is picked up on Automatic License Plate Reader (ALPR) at Sheridan and 165 in Pleasant Prairie, Wisconsin. The vehicle had an Illinois license plate bearing CJ39726. That registration, when checked through the Wisconsin Department of Transportation, showed it to be stolen out of Chicago, Illinois on October 1, 2022.

7. At approximately 01:19 a.m. on October 3, 2022, the Pleasant Prairie Police Department (Wisconsin) was dispatched to a single vehicle fire around 85th Street and 7th Avenue in Pleasant Prairie. Officers arrived and found a fully engulfed Dodge Charger with no owner/occupant on scene and all four doors open. The Fire Department arrived and immediately extinguished the fire. The vehicle had no license plates affixed to it, but the VIN was still readable. The VIN was 2C3CDXHG7GH226722 and according to a check of the Wisconsin Department of Motor Vehicles, that vehicle had an assigned license plate of Illinois CJ39726, which was the same Dodge Charger stolen out of Chicago on October 1, 2022, as referenced above.

8. Located in and around the vehicle were 9mm and .40 caliber Smith & Wesson brass casings, which were the same calibers used in the homicide of S.B. in Waukegan, Illinois, as referenced above

9. Regarding the phones mentioned in paragraph four of this affidavit, subsequent search warrants of the phones recovered from the homicide scene revealed both phones belonged

to JAVONTE DAVIS. DAVIS, a documented Gangster Disciple Gang member, was wanted for felony Firearms violations and an Illinois Department of Corrections probation violation.

10. Upon analyzing one of the phones, Detective Llenza of the Waukegan Police Department learned that the apple ID assigned to the phone was KamKappa4l@icloud.com. Furthermore, Detective Llenza learned that the Facebook account associated with the phone utilized the Facebook moniker “Kam Fa Kam.” Based upon the investigation to date, including review of and comparison DAVIS’ previous booking photographs and driver’s license photographs, Detective Llenza knows that the Facebook account “Kam Fa Kam” belongs to DAVIS. Finally, the device had a secondary email, monteball427@gmail.com. Detective Llenza knows “monte” to be a nickname/alias for DAVIS.

11. With this information Detective Llenza, through lawful legal process obtained information from the Facebook account “Kam Fa Kam” belonging to DAVIS who is suspected to be one of the shooters in the Waukegan Homicide. Detective Llenza learned of an IPV6 number utilized to log into the Facebook account “Kam Fa Kam.” Through additional investigative techniques, Detective Llenza learned that the IPV6 number belonged to a Verizon TracPhone. Again, through lawful legal process, Detective Llenza obtained records from Verizon showing that the IPV6 number used to log into DAVIS’ Facebook account had an associated phone number of (847) 650-8437.

12. Detective Llenza obtained toll records from Verizon and upon analyzing the toll records he noted that (847) 650-8437 was in contact with at least two known associates of DAVIS, including another suspect in this investigation, WILLIAM FILLYAW. The second associate was identified as Nicole Dussault, DAVIS’ girlfriend.

13. While reviewing the Apple iPhone, Investigators were able to identify text messages on October 2, 2022 around 16:14, between DAVIS and a person identified as “Will,” later identified as WILLIAM FILLYAW. DAVIS and FILLYAW discuss going to Chicago to pick up a gray Dodge Charger. Investigators were able to obtain video from an Oasis rest area between Waukegan and Chicago, where they positively identified DAVIS and FILLYAW exit a black conversion van bearing Wisconsin registration ANB9487. At 20:33 on October 2, 2022, FILLYAW could be seen entering the Oasis and 20:34 FILLYAW exits the Oasis, holding the door open for DAVIS to enter to use the bathroom.

14. The Apple iPhone that was recovered also provided “Native Locations” for the cell phone. The locations show the device at the scene of the homicide. It also shows the device go from Zion to Chicago on the evening leading into the homicide, when it’s believed the suspect vehicle was purchased. The location data also shows the device around Grand/Jackson BP Gas Station in Waukegan at approximately 11:50 p.m. on October 2, 2022.

15. Surveillance video recovered from that location shows what appears to be DAVIS, arrive in the Dodge Charger, and go inside wearing a mask and gloves. DAVIS was observed wearing unique pants with an “A” design placed between wings on the front left pocket area of the pants. DAVIS was seen wearing the same pants on his Kam Fa Kam Facebook user profile.

16. At approximately 12:10 a.m. on October 3, 2022, approximately 4 minutes after the homicide, the black conversion van bearing Wisconsin registration ANB9487 is observed on traffic cameras approximately one and a half blocks away from the scene of the homicide, leaving the area and travelling north towards Kenosha, Wisconsin. Additionally, FILLYAW’s phone, 224-946-6088, was pinging in the location of the homicide at the time the homicide occurred.

17. Additionally, at approximately 12:36 a.m. on October 3, 2022, a black conversion van bearing Wisconsin registration ANB9487, previously identified as being affiliated with DAVIS and FILLYAW, arrived at a Shell gas station located at 11748 75th Street, Kenosha, Wisconsin. The driver exited the vehicle and purchased a 2-gallon gas can and \$8.50 worth of gasoline. Surveillance cameras from the gas station show FILLYAW as the person purchasing the gas can and gasoline. FILLYAW then re-enters the vehicle and travels east towards Pleasant Prairie.

18. Investigators were able to obtain video surveillance from the Final Inning bar located at 9048 Sheridan Rd, Kenosha, WI 53143. The video camera which faces the intersection of 91st Street and Sheridan Road showed the Dodge Charger travelling northbound on Sheridan Rd and turning east onto 91st Street towards the burn site at approximately 1:46 a.m. Shortly after, the black conversion van was seen travelling southbound on Sheridan Road and turning eastbound on 91st Street towards the burn sit at approximately 2:04 a.m.¹

CONCLUSION

19. Based on the information above, I submit that there is probable cause to believe that JAMONTE DAVIS and WILLIAM FILLYAW have violated 18 U.S.C. § 844(i) (Arson of a vehicle) and 844(h) (Use of arson in furtherance of another Felony).

¹ It should be noted that the employee of the Final Inning bar indicated that the time stamp is off by several minutes, but the timing is still within the relevant time frame of these incidents.